

NEW YORK  
LONDON  
SINGAPORE  
PHILADELPHIA  
CHICAGO  
WASHINGTON, DC  
SAN FRANCISCO  
SILICON VALLEY  
SAN DIEGO  
LOS ANGELES  
BOSTON  
HOUSTON  
DALLAS  
FORT WORTH  
AUSTIN

# DuaneMorris®

FIRM and AFFILIATE OFFICES

RUDOLPH J. DI MASSA, JR.  
OF COUNSEL  
DIRECT DIAL: +1 215 979 1506  
PERSONAL FAX: +1 215 689 2138  
E-MAIL: DiMassa@duanemorris.com

[www.duanemorris.com](http://www.duanemorris.com)

HANOI  
HO CHI MINH CITY  
SHANGHAI  
ATLANTA  
BALTIMORE  
WILMINGTON  
MIAMI  
BOCA RATON  
PITTSBURGH  
NORTH JERSEY  
LAS VEGAS  
SOUTH JERSEY  
SYDNEY  
MYANMAR

ALLIANCES IN MEXICO

July 30, 2025

## **VIA ECF**

Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

***Re: Zahn v. The Bolivarian Republic of Venezuela***  
**Civil Case No. 24-cv-09271-JPC**

Your Honor:

We represent Plaintiff in the above-captioned matter. With the consent of defendant The Bolivarian Republic of Venezuela (the “Republic”), we respectfully write pursuant to Rule 3(B) of your Honor’s Individual Rules and Practices to request a one-month extension of the parties’ respective upcoming deadlines: (1) the August 1, 2025 deadline for Plaintiff to file any Amended Complaint; and (2) the August 15, 2025 deadline for Defendant to respond to the Complaint (D.E. 13). This is the parties’ second request for an extension of these deadlines, and there are no upcoming deadlines or appearances before the Court.

As a reminder, the Court previously extended the deadline to allow the parties to continue discussions regarding a possible amendment of the Complaint by consent, pursuant to Fed. R. Civ. P. 15(a)(2), with the goal of streamlining issues for the Court’s consideration. This request is made due to the summer vacation schedules of certain counsel and clients on Plaintiff’s side during the current period, as well as the parties’ mutual interest in further discussing the scope of any proposed amendment.

DUANE MORRIS LLP

22 VANDERBILT  
335 MADISON AVENUE, 23RD FLOOR  
NEW YORK, NY 10017-4669

PHONE: +1 212 692 1000 FAX: +1 212 692 1020  
DMI\16911959.2

Honorable John P. Cronan  
July 30, 2025  
Page 2

Duane Morris

We therefore respectfully request that Plaintiff's deadline to file any Amended Complaint be extended until September 2, 2025, and Defendant's deadline to respond to the Complaint be extended until September 16, 2025.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Rudolph J. Di Massa, Jr.

Rudolph J. Di Massa, Jr.  
Anthony J. Constanti  
Stephanie Lamerce  
DUANE MORRIS, LLP  
22 Vanderbilt  
335 Madison Avenue  
23<sup>rd</sup> Floor  
New York, New York 10017  
Telephone: (215) 979-1506  
[dimassa@duanemorris.com](mailto:dimassa@duanemorris.com)  
[ajconstantini@duanemorris.com](mailto:ajconstantini@duanemorris.com)  
[slamerce@duanemorris.com](mailto:slamerce@duanemorris.com)

*Counsel for Plaintiff*


/s/ Marisa F. Antonelli

Marisa F. Antonelli  
Camilo Cardozo  
Dora Georgescu  
VINSON & ELKINS LLP  
The Grace Building  
1114 Avenue of the Americas  
32<sup>nd</sup> Floor  
New York, New York 10036  
Telephone: (212) 237-0000  
[mantonelli@velaw.com](mailto:mantonelli@velaw.com)  
[ccardozo@velaw.com](mailto:ccardozo@velaw.com)  
[dgeorgescu@velaw.com](mailto:dgeorgescu@velaw.com)

*Counsel for Defendant The  
Bolivarian Republic of  
Venezuela*

The request is granted. Any Amended Complaint shall be filed by September 2, 2025. Defendant shall respond to the Complaint by September 16, 2025. The Clerk of Court is respectfully directed to close Docket Number 14.

SO ORDERED.  
Date: July 31, 2025  
New York, New York

  
JOHN P. CRONAN  
United States District Judge